

MIAMI COUNTY SHERIFF'S OFFICE

TIMOTHY G. MILLER, SHERIFF

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April 17, 2015

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Room TW-A325
Washington, DC 20554

RE: Ex Parte Communication
WC Docket No. 12-375; Inmate Calling Services

Dear Ms. Dortch:

The Miami County Sheriff's Office hereby files an ex parte communication in connection with the above referenced proceeding. The Miami County Sheriff's Office supports the comments and reply comments filed by the National Sheriffs' Association in this proceeding. The purpose of this filing is to submit additional information specific to this office in support of NSA's position that Sheriffs must be allowed to recover their costs if ICS services are to continue to be widely available in jails.

Inmate calling is a discretionary service in our jail and it is allowed for the benefit of inmates and their families. If we are not permitted to recover the costs associated with the provision of ICS service, then we can and we may be forced to significantly limit, or eliminate altogether, access to inmate phones in our jail. Indiana state statutes require only one 20 minute visit per inmate per week. Currently we have the incentive to allow significant access to ICS services and inmates are able to make calls, and have visits on average, 16 hours per day. Denying payments to jails, or restricting such payments to levels that do not cover our costs, will have the effect of reducing the incentive and ability to continue to allow ICS in this manner. The system we currently utilize provides not only phone services, but video visitation. The system also records audio and video used to maintain safety and security of the facility. This system reduces staff requirements allowing us to currently provide inmates the enhanced access to visits and phone calls well beyond the state required minimums. The equipment cost of \$180,000 plus maintenance and upgrades is provided by the ICS vendor through the fees they collect. This is a system we could not afford to purchase or maintain if we had to rely on taxpayer funding, thus reducing services to the inmates and compromising security for the facility.

Our budget has been reduced each of the past five years and we anticipate further budget cuts this year. In addition to the security and administrative functions that must be maintained, there are programs for inmates that we are required to maintain by law. If the cost of allowing ICS must compete with all other budget needs, it may not be funded. However, if the cost of allowing ICS has its own source of funding, it is less likely to be impacted by the budget process.

I feel it is incumbent upon me to maintain a safe and secure environment for the inmates and staff of the facility of which I am steward, while reducing the tax burden on our citizens in every way possible. This is not only a legal, but moral obligation I have as Sheriff.

Accordingly, Sheriffs incur significant costs in allowing ICS in jails, and Sheriffs must be allowed to recover their costs to be able to continue to allow ICS and to encourage the deployment of ICS in jails.

If you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Timothy G. Miller", with a stylized flourish at the end.

Timothy G. Miller
Sheriff of Miami County

Cc: Congresswoman Jackie Walorski
Attorney General Greg Zoeller
ISA ED Steve Luce